

Chemicals Division

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**Celanese**

201-15623

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U.S. Environmental Protection Agency  
P.O. Box 1473  
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Update to Celanese's High Production Volume Challenge Program Commitment

In a letter to EPA on March 12, 1999, Celanese Ltd. agreed to voluntarily participate in EPA's High Production Volume (HPV) Challenge Program. At that time, Celanese volunteered to sponsor 24 chemicals in the HPV Challenge Program either directly or indirectly through its participation in panels and testing groups. Estimated initiation year of any future needed testing and relationships to testing consortia were also provided within this correspondence. An additional twenty-eight of Celanese's products are now in the Organization for Economic and Community Development (OECD) Screening Information Data Set (SIDS) program. These 28 chemicals are exempt from the HPV program because of the required testing has been completed already or is in progress.

The purpose of this letter is: (1) update Celanese's HPV Challenge sponsorship list (attached) to include additional chemicals; (2) to clarify specific issues for three of the HPV listed chemicals affecting Celanese; and (3) to propose de-listing of one HPV chemical. These modifications are as follows:

1. Twelve new chemicals (beginning with Methyl Formate in the attached chart) have been added to the sponsorship list.
- 2a. The projected start date for 1,3 Butylene Glycol testing on animals will be deferred until 2002. This change was made to follow suggested HPV testing principles outlined in the recent letter from Susan H. Wayland, Deputy Assistant Administrator at EPA's Office of Prevention, Pesticides and Toxic Substances dated October 14, 1999.
- 2b. Methoxymethanol, CAS # 4461-52-3 and a listed HPV chemical, exists only in equilibrium concentrations within certain formaldehyde, methanol, and water mixtures. Methoxymethanol is not stable or isolatable at ambient conditions making it impossible to test. The toxicological effects of methoxymethanol would be expected to be those of its components, formaldehyde and methanol.

**Hoechst** ■

Celanese  
A member of the Hoechst Group

Both formaldehyde and methanol are HPV chemicals volunteered by Celanese as part of consortia. Therefore, we intend to represent methoxymethanol from toxicological information concerning formaldehyde and methanol.

- 2c. Dipentylamine, a listed HPV chemical as CAS # 2050-92-2, is commercially available as a component of a mixture commonly called diamylamine. Diamylamine is composed of three isomers: N-(2-Methylbutyl)-1-Pentanamine--CAS # 61361-18-0; N-Pentyl-1-Pentanamine--CAS # 2050-92-2; and 2-Methyl-N-(2-Methylbutyl)-1-Butanamine--CAS # 27094-65-1. These isomers are not isolatable, therefore any future HPV testing will be done on the mixture, not any one isomer of the mixture.
- 3a. Hydracrylic acid, acrylate, a listed HPV chemical as CAS # 24615847, has been reported by Hoechst Celanese and/or Celanese on previous IURs in error. This substance, commonly known as acrylic acid dimer, is always present as an unintentional byproduct / impurity in the production of acrylic acid and is not isolated as an intermediate or product. Acrylic acid, which contains this dimer, has already been fully tested in the OECD SIDS program, and should fairly represent the product in commerce. Therefore, hydracrylic acid, acrylate, CAS#24615847, should be de-listed from the HPV Challenge list.

To the extent that any of the HVP sponsored chemicals are on the International Council of Chemical Associations (ICCA) program list of chemicals for testing, the required analysis and data may be developed under that program.

With the above updates, the number of chemicals Celanese has volunteered to sponsor in the HPV Challenge Program, either directly or indirectly through its participation in panels and testing groups, before the voluntary deadline of December 1, 1999, now totals 36. Celanese is committed to the HPV Challenge program's principal objective to provide the public with basic health and environmental effects information about our chemicals that are widely used in high volumes.

The information and data we provide under the HPV Challenge Program will be made publicly available. Adrian Becker (972-443-4705) is our technical contact. His mailing address is Celanese Ltd., 1601 West LBJ Freeway, P. O. Box 819005, Dallas, TX 75381-9005.

Jerry W. Dunn  
Vice President of EHSA  
Celanese Chemicals Americas

Chemical Name	CAS Number	Projected Start Date	Consortia
✓ 1,3 Butylene Glycol	107-88-0	2002*	Celanese
✓ Ethyl Acrylate	140-88-5	2000	BAMM
✓ Methyl Acrylate	96-33-3	2000	BAMM
✓ Butyl Acrylate	141-32-2	2000	BAMM
✓ n-Propyl Acetate	109-60-4	2001	CMA Oxo Panel
✓ Isopropyl Acetate	108-21-4	2001	CMA Oxo Panel
✓ n-Butyric Acid	107-92-6	2001	CMA Oxo Panel
✓ Isobutyl Acetate	110-19-0	2001	CMA Oxo Panel
✓ Isobutyric Acid	79-31-2	2001	CMA Oxo Panel
✓ n-Valeraldehyde	110-62-3	2001	CMA Oxo Panel
✓ Valeric Acid	109-52-4	2001	CMA Oxo Panel
✓ Isobutyric Anhydride	97-72-3	2001	CMA Oxo Panel
✓ Propionic Acid	79-09-4	2001	CMA Oxo Panel
✓ 2-Methylbutyric Acid	116-53-0	2001	CMA Oxo Panel
Methanol	67-56-1	2003	American Methanol Institute
Formaldehyde	50-00-0	2003	Formaldehyde Epidemiology Toxicology and Environmental Group
✓ Isopropylamine	75-31-0	2001	CMA Amines Panel
✓ Cyclohexylamine	108-91-8	2001	CMA Amines Panel
✓ Di-n-propylamine	142-84-7	2001	CMA Amines Panel
✓ Di-n-butylamine	111-92-2	2001	CMA Amines Panel
✓ n-Butylamine	109-73-9	2001	CMA Amines Panel
✓ Tri-n-butylamine	102-82-9	2001	CMA Amines Panel
✓ Diamylamine (Mixed Isomers)	2050-92-2 61361-18-0 27094-65-1	2001	CMA Amines Panel
✓ N-Heptanoic Acid	111-14-8	2000	Panel with Elf Atochem
✓ Methyl Formate	107-31-3	2001	CMA Formates Panel
✓ Formic Acid	64-18-6	2001	CMA Formates Panel
✓ Sodium Formate	141-53-7	2001	CMA Formates Panel
✓ Nonanoic Acid	112-05-0	2001	Panel with Henkel or Soap and Detergent Association
✓ N-Ethylmethallylamine	18328-90-0	2001	CMA Amines Panel
✓ n-Octylamine	111-86-4	2001	CMA Amines Panel
✓ 2-Ethylhexylamine	104-75-6	2001	CMA Amines Panel
✓ Monomethylamine	74-89-5	2001	CMA Amines Panel
✓ Ethylamine	75-04-7	2001	CMA Amines Panel
✓ Diethylamine	109-89-7	2001	CMA Amines Panel
✓ Acetic Acid	64-19-7	2001	CMA Acetic Acid/ Salts Panel
✓ Methoxymethanol	4461-52-3	2004	Celanese

\* Further testing on animals has been deferred from 1999 until 2002.